BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL HATE CONHISSION DOCKET NO. R2000-10F THE SECRETARY

INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS OF UNITED PARCEL SERVICE
DIRECTED TO UNITED STATES POSTAL SERVICE
WITNESS EGGLESTON
(UPS/USPS-T26-21 through 23)
(March 22, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby directs the following interrogatories and requests for production of documents to United States Postal Service witness Eggleston: UPS/USPS-T26-21 through 23.

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

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INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS EGGLESTON

UPS/USPS-T26-21. Refer to your response to UPS/USPS-T26-9(a). On page 5 of the MTAC Annual report, the MAIL.DAT system is discussed. Provide all available information with respect to the MAIL.DAT system, including, but not limited to, reports issued by the DirectLink/MAIL.DAT work group, and minutes of any meetings.

UPS/USPS-T26-22. Refer to your responses to UPS/USPS-T26-10 through 15.

- (a) Confirm that acceptance costs for plant-verified DBMC parcels entered at the BMC are contained in the BMC platform cost pool. If not confirmed, explain in detail.
- (b) Confirm that those intra-BMC and inter-BMC Parcel Post pieces that are entered at the window do not incur verification or acceptance costs. If not confirmed, explain in detail.
- (c) What was the volume of intra-BMC Parcel Post entered at the window (i.e., not entered in bulk at the platform) in FY1998?
- (d) What was the volume of inter-BMC Parcel Post entered at the window (i.e., not entered in bulk at the platform) in FY1998?

UPS/USPS-T26-23. Refer to USPS-T-26, Attachment X. Describe in general terms how the results shown in this Attachment are used in the analysis or projection of Parcel Post costs.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.

John E. McKeever

Attorney for United Parcel Service

Dated: March 22, 2000

Philadelphia, Pa.

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